

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

CYNTHIA GEIGER,

Plaintiff,

v.

RYAN FULLER SMALLWOOD,

Defendant.

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CIVIL ACTION NO.: 3:06cv194-WHA

DEFENDANT RYAN FULLER SMALLWOOD'S
REQUESTED VOIR DIRE QUESTIONS

Pursuant to the Order on Pretrial Hearing, the Defendant submits the following Requested Voir Dire Questions to the Court:

1. Are any of you related to the Plaintiff Cynthia Geiger, 28 Iris Road, Seale, Alabama?
2. Do any of you know the Plaintiff Cynthia Geiger?
3. Do any of you know or are any of you personally acquainted with any of the following persons, who are relatives or friends of Ms. Geiger:
 - Christopher Geiger (husband, Russell County)
 - Crystal Davis (daughter, Russell County)
 - Brandy Davis Granger (daughter, Russell County)
 - Glenn Davis (ex-husband, Russell County)
 - Debbie Jacobs (sister, Russell County)
 - Johnnie Jacobs (brother-in-law, Russell County)
 - Courtney Barrow (niece, Lee County)
 - Ryan Barrow (nephew)
 - Mayzell Kitchens (mother)
 - Linda Rogers (close friend, Lee County)
 - Cathy McKenzie (Russell County)
 - Mike McKenzie (Russell County)
 - Joyce McKenzie (Russell County)
4. Ms. Geiger worked for Monarch Services in Columbus, Georgia and Phone Mart in Columbus, Georgia. These offices did business in other locations such as Opelika. Have any of you done business or had any dealings or contacts with either of these businesses?

5. Do any of you know any of the Plaintiff's attorneys, Benjamin H. Parr, Charles M. Ingram, Jr., and J. Brandon Rice, who are with the law firm of Ingram, Rice & Parr, L.L.C. in Opelika, Alabama?

6. While you may not know them personally, does anyone know any of the Plaintiff's attorneys generally or just acquainted with them? (For example, belong to the same church, civic organization, club, or some other group.)

7. Have any of you ever used the legal services of Benjamin H. Parr, Charles M. Ingram, Jr., and/or J. Brandon Rice, that is, have any of you ever consulted them, employed them, been represented by them, or used them for legal counsel in any manner? (Without disclosing the nature of the representation).

8. Have any members of your immediate family ever been employed by any of these attorneys? (Immediate family - parents, spouse, children, brothers, or sisters)

9. Have you or any members of your immediate family ever been involved in any type of motor vehicle accident either as a passenger or a driver and suffered any injuries as a result of that accident?

10. If so, how were you or any member of your immediate family injured? (For example, neck, back, head, or what part of your body.)

11. Have you or any members of your immediate family ever had neck surgery and/or back surgery as a result of a motor vehicle accident?

12. Have any of you or any members of your immediate family ever had neck surgery and/or back surgery for reasons other than a motor vehicle accident or some type of injury, such as a degenerative condition or to remove bone spurs or osteophytes?

13. Have you or any members of your immediate family ever been treated by Dr. William E. Adams in Columbus, Georgia?

14. Does anyone know Dr. William E. Adams personally?



Stanley A. Martin (MAR049)
Attorney for Defendant
Ryan Fuller Smallwood

Post Office Box 2526
Opelika, Alabama 36803-2526
(334) 749-4142
(334) 749-4131 FAX

CERTIFICATE OF SERVICE

I hereby certify that I have this day served an exact copy of the foregoing Defendant's Requested Voir Dire Questions upon the following counsel of record, by depositing a copy of same in the United States Mail, properly addressed with first class postage prepaid thereon.

Honorable Benjamin H. Parr
Post Office Box 229
Opelika, Alabama 36803

This 30th day of April, 2007.



Stanley A. Martin